

Final EIR Introduction

This section has been changed subsequent to the public review of the February 2005 Draft EIR and the April 2008 Revised Draft EIR as follows:

1. This section was updated to include a description that the provisions of the County of San Diego Grading Ordinance Section 87.429 Human Remains or Native American Artifacts would be implemented during grading activity on the site.
2. The Conclusions section was expanded to provide more explanation as to how impacts will be mitigated to a level less than significant.

2.6 Cultural Resources

The following discussion of impacts to cultural resources is based on the Cultural Resources Significance Evaluation (ASM, July 2001), the Cultural Resources Survey for the Salvation Army's proposed Water Tank and Campgrounds Installation (ASM, March 2001), and results of the Sierra Del Mar Salvation Army Survey (ASM, February 1999), all of which were prepared by ASM Affiliates (Appendix D). The February 1999 survey resulted in the identification and recordation of five prehistoric archaeological sites within the property, four small milling stations and one low-density lithic scatter. Consultation with Dr. Glenn Russell, County archaeologist revealed that four of the sites should be tested to evaluate their significance, assess potential impacts and provide, as necessary, mitigation recommendations. The fifth site, a small milling station located within an intact riparian community would not be affected by the proposed project. The March 2001 survey resulted in one cultural resource consisting of a late 1930s historic building with associated foundation pads and trash dump. As described in more detail below, this resource does not meet any of the criteria for listing on the California Register of Historical Resources. The possible nomination of Mussey Grade Road to the California Register of Historical Resources is also discussed in this section.

2.6.1 Existing Conditions

2.6.1.1 Relevant Prehistory

Approximately 2,000 years ago, groups of people from the Colorado River region began migrating into southern California. It is generally accepted that these eastern groups were the ancestors of the ethnohistoric Kumeyaay of southern California. The Yuman-speaking Kumeyaay (formerly referred to as the Diegueño) occupied southern San Diego County and Imperial County.

Acorns were the most important single food source used by the Kumeyaay. Their villages were usually located near water necessary for leaching acorn meal. Other storable resources such as mesquite or agave were equally valuable to groups inhabiting desert areas, at least during certain seasons. Seeds from grasses, manzanita, sage, sunflowers, lemonadeberry, chia, and other plants were also used along with various wild greens and fruits. Deer, small game and birds were hunted, and fish and marine foods were eaten. The material culture included ceramic cooking vessels, basketry, flaked stone tools, milling equipment, arrow shaft straighteners, and stone, bone and shell ornaments.

Hunting implements consisted of the bow and arrow, curved throwing sticks, nets, and snares. Shell and bone hooks, as well as nets, were used for fishing. Lithic resources of quartz and metavolcanics were commonly available throughout much of the Kumeyaay territory. Other materials, such as obsidian, chert, chalcedony, and steatite, occur in more localized areas and were acquired through direct procurement or exchange.

Kumeyaay culture and society remained stable until the advent of missionization and displacement by Hispanic populations during the eighteenth century. The effects of missionization, along with the introduction of European diseases, greatly reduced the native population of southern California. By the early 1800s California was under Mexican rule, and the establishment of ranchos under the Mexican land grant program further disrupted the way of life of the native inhabitants.

The Portola expedition entered western San Diego from Baja California in 1769. With the establishment of the presidio and mission at San Diego many of the local Kumeyaay were incorporated into their sphere of influence.

2.6.1.2 Salvation Army Camp History

The following account of the history of the Salvation Army Camp is based on a history compiled in 1966 by the First Presbyterian Church of San Diego (Freeborn, 1966). Much of the information contained in the history was supplied by Mr. Charles H. Forward, then proprietor of Wildwood Ranch (Forward, 1966). The camp was originally known as Rancho del Cielo, the original grant for which was registered in the Surveyor General's Office in San Francisco in 1883. A patent was recorded in the County Recorder's Office, San Diego County on October 3, 1895 in the name of Morgan Sweeney who conveyed one-half interest to Francis Bradley. In 1913, the property was conveyed by deed to J.C. Tobin and subsequently the title passed to Maude Belcher on December 31, 1918. The Belchers lived on the property for several years in a house that was subsequently torn down. In January 1924, the property was purchased by John W. Mitchell, a wealthy man who owned an art gallery and residence in Coronado. He constructed a large rustic home on the property. Following Mitchell's death, the property was deeded to W. Jefferson Davis who had presented a large claim against Mitchell's estate for attorney's fees. The First Presbyterian Church of San Diego purchased the 442-acre property from Davis in 1958, and in 1968 purchased the adjacent 120-acre Gatewood property. The property was then purchased by the Salvation Army in March 1997.

During the Bradley ownership of the ranch, the property became known as "Bradley Springs" as water was bottled from a spring on the side of the mountain above the present buildings and sold locally as health-giving water. When Mr. Mitchell bought the ranch in 1924, the property had two dams, a lithia reservoir, six miles of road, a swimming pool, and irrigated groves of orange, grape fruit, lemons and olives. There were also two springs besides the lithia spring; the latter flowing into a reservoir rated at 500,000-gallon capacity. The ranch house constructed by Mitchell was two-stories and constructed of redwood. In 1952 the ranch house burned down and a new stucco building was constructed on the site the following year with the original chimney incorporated into the new structure. An adjacent guesthouse of stone was also constructed at this time.

Numerous improvements to the property took place under the ownership of the First Presbyterian Church, which developed the property under Special Use Permit (SUP) #70-379 (issued December 1970). Improvements were for a church retreat and recreational facility to include five cabins, a program lodge hall, dining room, and a swimming pool with bath facilities. SUP #70-379 was modified in March 1976 to add five guest cabins, a youth activities building, and two staff housing units to the 562-acre site.

2.6.1.3 Possible Nomination of Mussey Grade Road to California Register

Mussey Grade Road may be eligible for nomination for listing on the California Register of Historical Resources due to its potential for cultural and historical resources. The California Register is an authoritative guide to the state's significant historical and archaeological resources. The California Register defines a historical resource as "any object, building, structure, site area or place which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California (Saunders, 1999)." The road, built in 1886, was used for travel from the City of San Diego to the towns of Ramona and Julian from 1886-1943. In 1943, the road ceased to be a thoroughfare when the lower portions of it were covered by San Vicente Lake. The Salvation Army Divisional Camp is located at 14488 Mussey Grade Road. As of September 2001, the two-lane, 5.3-mile paved road has not come before the Historic Sites Board.

2.6.1.4 Archaeological Site Survey and Testing

An archaeological survey was conducted by ASM Affiliates on February 8, 1999. A second archaeological survey was conducted for the proposed water tank and overnight campgrounds, including 200 feet from proposed development and trails, on February 2001. A total of four archaeological sites were recorded during the first survey, in addition to the single site located during the environmental constraints study in December 1998. The second survey identified a late 1930s historical resource (P-37-024202) consisting of foundation pads and associated trash scatter. This section describes the testing results of the four archaeological sites recommended for evaluation by the County, as well as the existing conditions of P-37-024202. The fifth site (CA-SDI-15888), which was not tested, contained a small milling station on a large boulder consisting of two bedrock mortars. One of the mortars is quite well developed through use, but the other is less so. The site lies within an intact riparian community consisting of Live Oaks, reeds and Western Sycamores. The fifth archaeological site was not tested because the location is outside of the future phased expansion of the proposed project and no new activity would occur within proximity of the site.

A total of four archaeological sites (CA-SDI-15113, CA-SDI-15114, CA-SDI-15115 and CA-SDI-15116) were tested for their significance. Archaeological testing included site mapping, excavation of shovel test pits (STPs) and excavation units, and laboratory testing. Each STP measured 40 x 40 centimeters in dimension and was excavated in 25-centimeter levels. Manual excavation of 1 x 1 meter units was used to determine the character, structure and integrity of subsurface cultural deposits in areas of the four sites where there was a relatively strong likelihood that such deposits were present based on surface indicators. Recovered material was taken to the ASM Laboratory for further analysis. The sites consist of three bedrock milling stations and one sparse lithic scatter. A brief description of the sites is provided below:

A. CA-SDI-15113

This small bedrock milling site, located north of CA-SDI-15114, was originally recorded as a single, poorly developed slick on a low granite boulder. Severe disturbance by heavy equipment was noted. Dirt and several large rocks appear to have been pushed and/or piled onto the northern side of the boulder. Due to the location of this disturbance, an excavation unit was placed at the southern base of the granite boulder. One STP was placed to the northwest of the unit, one to the southwest, one to the southeast, and one to the northeast. The unit was excavated to a maximum depth of 50 centimeters. Very few artifacts (five pieces of flaked stone debitage, one ceramic sherd, and one metate fragment) were recovered. The northwest corner of the unit was filled with large pieces of granite, some of which seemed to be a continuation of the granite boulder. Artifacts were recovered from only one STP. Two ceramic sherds were recovered from the STP to the southeast of the unit.

B. CA-SDI-15114

CA-SDI-15114 was originally recorded as a small lithic scatter measuring 25 x 24 meters and consisting of 11 flakes and a single piece of quartz shatter. During the site evaluation, the condition of the site was noted as “relatively poor” due to grading associated with brush control. These impacts were apparently on going. The site was interpreted as an outlying tool manufacturing area associated with an undiscovered habitation site in the valley to the east.

Between the original survey and the current testing, CA-SDI-15114 was subjected to major impacts, primarily due to brush control/removal. The vegetation had been cleared and extensive vehicle tracks were evident across the entire site. Immediately south of the site, piles of branches and sawed logs were mounded around a large area that had been completely cleared of vegetation. Brush control/removal greatly increased ground visibility. A re-survey of the site identified at least 30 pieces of debitage spread over a 45 x 25-meter area. The current site boundaries reflect, to some extent, the transportation of artifacts by tracked vehicles.

After the site boundaries were determined, an excavation unit was placed in the least disturbed area near the center of the site. One STP was placed to the north of the unit, one to the south, one to the west, and one to the east. The unit was excavated to a maximum depth of 90 centimeters. Uniform, coarse-grained gravelly loam extended to a depth of approximately 80 centimeters. Below this sediment was decomposed granite (sterile). Approximately 275 flaked stone artifacts were recovered from the excavation unit. Three to six artifacts were recovered from the STPs to the north, east and west of the unit. The recovery of seven flaked stone artifacts was greatest in the STP to the south of the unit. This STP, terminating at a maximum depth of 95 centimeters, revealed stratigraphy very similar to that of the unit.

The surface of the CA-SDI-15114 has been severely disturbed and current site boundaries represent, to some extent, the transportation of artifacts by tracked vehicles. The archaeological testing revealed a cultural deposit extending to a depth of approximately 80 centimeters and consisting of only flaked stone artifacts.

A total of 335 artifacts were recovered from four STPs and one excavation unit at CA-SDI- 15114. These substantive subsurface deposits were present to a depth of approximately 85 centimeters. The majority of this material is chipped stone debitage, with a small number of cores, one utilized flake, a single unifacially

retouched tool, a miscellaneous artifact/manuport, and 1.9g of vertebrate remains. The artifact assemblage from CA-SDI-15114 is composed primarily of flaked stone manufacturing debris, including flakes and cores, and a few tools. A number of bifacial thinning flakes are present, indicating that formal tool preparation took place at the site despite the lack of formal bifacial tools in the artifact assemblage. No ceramics, ground stone, or substantial vertebrate or invertebrate faunal remains were recovered, suggesting that prehistoric activities at this site were restricted to relatively intensive flaked stone manufacture.

C. CA-SDI-15115

The original recording documented two amorphous bedrock slicks, separated by approximately 25 meters. One flake was noted in the area between the two milling features. An excavation unit was placed mid-way between the two slicks. Six STPs were placed in various areas across the site. Three STPs were excavated in the extreme western portion of the site, one was placed at the base of one of the milling features (Feature 1), and two STPs were located near the other milling feature (Feature 2). The unit, terminated at a depth of 30 centimeters, produced three flaked stone artifacts. The only other artifacts (two ceramic sherds) were recovered from the STP placed at the base of Feature 2.

D. CA-SDI-15116

The original recording documented four milling slicks on a large outcrop of fine-grained granite that measured approximately 50 x 9 meters. A mano fragment was the only artifact noted during the site evaluation. No evidence of accumulated cultural debris was noted and, given the topographic location of the site and the surrounding sediment, it is unlikely that subsurface material existed at CA-SDI-15116. CA-SDI-15116 was subjected to impacts between the original survey and the current testing. Vegetation was completely cleared from a large area southwest of the outcrop, most likely during the installation of several white pipes, assumed to be used for percolation testing. These activities also enlarged the dirt foot path/trail into a well-traveled dirt road. Heavy equipment was most likely used to excavate a portion of the slope immediately to the south of the outcrop. The mano fragment previously noted was not relocated.

An excavation unit was placed near the southwestern base of the large outcrop, in an area that was not substantially disturbed. Four STPs were placed along the base of the large outcrop. The unit revealed a thin deposit of gravelly loam. Excavation of the unit was terminated at a depth of 30 centimeters. "Exploration" with trowel revealed a layer of rocks, at a depth of approximately 35 centimeters, that covered almost the entire 1 x 1 meter unit. Only 11 flaked stone artifacts were recovered from the unit excavation. All four STPs were negative.

E. P-37-024202

The March 2001 survey identified P-37-024202, a late 1930s historic building with associated foundation pads and a trash dump (Confidential Appendix A for location). The surviving building is a rustic, rectangular, one-room, single-story structure with a concrete pad, stone and mortar walls and timber roof and superstructure. It measures approximately 9 x 15 feet, with an inscription on the threshold that reads "1938." The 6'6" high walls are constructed of locally available stone and mortar. The masonry consists of undressed and uncoarsed local stone. The south and east and north walls support a wooden

superstructure consisting of a simple wooden frame with a vertical board nailed to it. Gaps in the boards were left for windows, but the structure may never have contained glazed windows. Fittings for wooden shutters attached to the outside of the openings suggest that there were closed by shutters. The roof is flat and also consists of boards nailed to rafters. Portions of the wooden superstructure and roof remain to a height of 7'1", and its condition is very poor. A paneled door lies outside the threshold. The building contains no fireplace or stove fittings, but does contain a recent water heater located in the southwest corner and piping leading from it suggests that it supplied water to a structure outside and above the present building. A concrete pad with wooden sill adjacent to the building to the east may have served as a foundation for an entry porch.

A stone and mortar stairway located on the south side of the building leads to an upper terrace that contains a number of concrete foundation pads, some of which may be contemporary with the structure. A large pad with wooden sill measuring 15'4" x 12' abuts the west side of the building on the upper terrace. Two smaller tiled pads are located to the north and west of this pad. The tiling on the northernmost pad consists of alternating white and pink tiles. To the southwest, a stone retaining wall and buried steps lead up to another terrace.

The structure appears to have been abandoned for approximately 25 years and is surrounded by several concrete structure foundations, which appear to have been added at various times after construction of the primary structure. A trash scatter, located down a slope on the southwest portion of the site, includes material dating from the 1940's to the present. Piles of structural debris, probably originating from demolished on-site structures, are located in the center of the site. A cleared picnic and campfire area, located south of the site, includes a recent veranda and picnic table. This area incurred some damage from the Cedar Fire.

2.6.1.5 Existing Regulations

A. Resource Protection Ordinance

The County of San Diego's Resource Protection Ordinance (RPO) was established to protect sensitive lands and protect their degradation and loss by requiring a resource protection study for certain discretionary projects. The goals of the RPO are achieved by establishing a review process that ensures projects are designed to avoid significant impacts to these resources, and that every effort has been incorporated into the project design to preserve these resources on the project site.

B. County of San Diego Grading Ordinance

Section 87.429 of the County of San Diego Grading Ordinance, Human Remains or Native American Artifacts, requires that grading operations be suspended if human remains or Native American artifacts are encountered during grading. If human remains or Native American artifacts are encountered, the grading operator is required to immediately inform the County Official, and the requirements of Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.99 shall be complied with. Health and Safety Code Section 7050.5 establishes intentional disturbance, mutilation or removal of interred human remains as a misdemeanor and establishes procedures for the removal and disposition of human remains, including contacting the Native Heritage Commission by telephone within 24 hours of discovering remains

believed to be Native American. Public Resources Code Section 5097.99 makes it unlawful for any person to obtain or possess any Native American artifacts or human remains which are taken from a Native American grave or cairn except as otherwise provided by law.

2.6.2 Thresholds of Significance

This section provides a review of the criteria for site importance under CEQA and the San Diego County RPO.

2.6.2.1 CEQA Significance Guidelines

Criteria for determination of the significance of a cultural building, object, structure, or site is provided in Section 21083.2(g) of the California Public Resources Code. Section 21083.2(g) specifies that if the lead agency determines that the project may have a significant effect on unique archaeological resources, the EIR shall address the issue of those resources. Under Section 21083.2(g), “unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Has a special and particular quality such as oldest of its type or best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to State CEQA Guidelines (State of California, 1999) Section 15064.5, a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. A significant historical resource is defined in Section 15064.5 as follows:

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources Pub. Res. Code Section 5024.1, Title 14 CCR Section 4850, et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the

California Register of Historical Resources (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 4852) including the following:

- is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- is associated with the lives of persons important in our past;
- embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
- has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner the following:

- Those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.
- Those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.
- Those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

2.6.2.2 RPO Significance Criteria

One purpose of the RPO is to protect and preserve significant prehistoric and historic sites. The RPO defines significant prehistoric or historic sites as the location of past intense human occupation where buried deposits can provide information regarding important scientific research questions about prehistoric or historic activities that have scientific, religious, or other ethnic value of local, regional, state, or federal importance. Such locations shall include, but not be limited to: any prehistoric or historic district, site, interrelated collection of features or eligible for inclusion in the National Register of Historic Places or the State Landmark Register; or include or eligible for inclusion, but not previously rejected, for the San Diego County Historical Site Board List; any area of past human occupation located on public or private land

where important prehistoric or historic activities and/or events occurred; and any location of past or current sacred religious or ceremonial observance protected under Public Law 95-341, the American Indian Religious Freedom Act or Public Resources Code Section 5097.9, such as burial(s), pictographs, petroglyphs, solstice observatory sites, sacred shrines, religious ground figures, and natural rock or places which are of ritual, ceremonial, or sacred value to any prehistoric or historic ethnic group. Development, trenching, grading, clearing, and grubbing, or any other activity or use damaging to significant prehistoric or historical site lands shall be prohibited.

2.6.3 Analysis of Project Effects and Determination as to Significance

All of the five prehistoric archaeological sites and one late 1930's historic resource site identified in the two cultural resources surveys have been individually analyzed below. As defined by the County RPO, none of these sites are considered significant prehistoric or historic sites. Therefore, the RPO does not apply to the project.

CA-SDI-15113

Impact 2.6.a.1 **CA-SDI-15113** - The artifact assemblage from CA-SDI-15113 is quite small, with a total of nine artifacts: 1) three ceramic sherds; 2) five pieces of flaked stone debitage; and, 3) a metate fragment having been recovered. These minimal subsurface deposits were deemed insignificant and no further testing is required for CA-SDI-15113. Development of the proposed project would not occur in the vicinity of CA-SDI-15113, but the site would have the possibility of being impacted by a potential leach field.

CA-SDI-15115

Impact 2.6.a.2 **CA-SDI-15115** - Two ceramics and three pieces of flaked stone debitage were recovered from six STPs and a single excavation unit at CA-SDI-15115. These minimal subsurface deposits were deemed insignificant and no further testing is required. CA-SDI-15115 is located on an existing playfield, which would remain as its current use throughout the future development. Implementation of the proposed project would not directly impact the site, but mandatory brush clearing activities and continued use and maintenance of the playfield may involve some surface disturbance to the site.

CA-SDI-15116

Impact 2.6.a.3 **CA-SDI-15116** - Artifact recovery from four STPs and one excavation unit at CA-SDI-15116 was limited to eleven pieces of flaked stone debitage. These minimal subsurface deposits were deemed insignificant and no further testing is required. Implementation of the proposed project would not directly have a construction impact to CA-SDI-15116. However, adjacent to the site, is a potential leach field area and mandatory brush clearing activities which would involve surface disturbance to the site.

CA-SDI-15114

Impact 2.6.b CA-SDI-15114 - A total of 335 artifacts were recovered from four STPs and one excavation unit at CA-SDI- 15114. These substantive subsurface deposits were present to a depth of approximately 85 centimeters. Although of somewhat degraded integrity due to prior disturbance, the archaeological testing indicated that it is still possible that important research questions could be addressed with data remaining at CA-SDI-15114. As such, the site is considered significant under CEQA significance criteria, but not under RPO significance criteria. Although development of the proposed project would not occur in the vicinity of CA-SDI-15114, a leach field is proposed north of the site.

CA-SDI-15888

The fifth site, which did not require testing, consists of a small milling station on a large boulder. The milling feature, which consists of two bedrock mortars, is situated approximately five meters north of a small east-trending drainage. One of the mortars is well developed through use, but the other is less so. The site lies within an intact riparian community consisting of Live Oaks, reeds and Western Sycamores. CA-SDI-15888 would not be disturbed by development of the proposed project as construction would not occur in this portion of the property. Therefore, the site will not be impacted.

P-37-024202

P-37-024202 is located within close vicinity of the existing overnight campground location. P-37-024202 is not known to be associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. While the parcel in which it is located is thought to be a homestead location, the surviving structure and foundations postdate the homestead period, and are therefore not associated with a homestead on the parcel. In addition, the location is remote from cultivatable land and is not likely to be associated with cultivation in the valley. There is no known association with the lives of important people in the past.

The style of construction of the surviving structure is rustic domestic architecture. It is entirely constructed with locally available materials, particularly undressed stone, and gravels use in the mortar. The integrity of the surviving structure is fair. The wooden superstructures have been removed from all but one foundation. In addition, the surviving structure is only one of a number of structures that must have existed previously at the site. Foundation pads are all that remain of these associated structures. The surviving building is not likely to have ever served as the domestic building and is more likely to have been a shed or outhouse associated with a house located on the terrace above it. Piles of structural debris located in the south of the site probably originated from demolished on-site structures.

As site P-37-024202 does not meet any of the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852), and does not retain integrity of design, workmanship, or materials, this resource is not recommended for eligibility for listing on the California Register. In addition the site is located in an area that would not be impacted by the project. No further evaluation is recommended for this resource.

Mussey Grade Road

The proposed project would not be affected by the nomination of Mussey Grade Road for listing on the California Register of Historical Resources. The proposed project is the expansion of the existing Salvation

Army Divisional Camp on privately-owned land and would not involve any development along Mussey Grade Road or within the road right-of-way. No alterations to the road would occur as a result of the proposed project. Therefore, there would be no impacts to Mussey Grade Road whether or not the road is nominated for listing on the California Register of Historical Resources.

2.6.4 Mitigation Measures

- MM** All archaeological materials recovered during the significance testing for sites CA-SDI-15113, CA-SDI-15114, CA-SDI-15115, and CA-SDI-15116 shall be curated according to current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation.
- 2.6.a**
- MM** Site CA-SDI-15114 is considered significant under CEQA criteria, and mitigation consisting of preservation of the site with a minimum 100-foot buffer via a 246 x 180 foot legally dedicated open space easement shall be created (Confidential Appendix, Figure 7).
- 2.6.b**

Implementation of an explicit resource preservation plan, in conjunction with the index sample excavated during this test and curation of the data recovered, would reduce impacts caused by the recent activities to below a level of significance. Furthermore, all grading activities must comply with the provisions of the County of San Diego Grading Ordinance Section 87.429 as it relates to human remains and Native American artifacts.

2.6.5 Conclusions

The proposed project has the potential to significantly impact four archaeological sites. Mitigation Measure 2.6.a will ensure that all archaeological materials recovered during the significance testing for these sites will be curated according to current professional repository standards. The collections and associated records will be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of the fees necessary for permanent curation. Implementation of this mitigation measure would substantially lessen the significant effect because it would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved. Proposed mitigation to curate artifacts recovered from the sites, and Mitigation measure 2.6.b requires the preservation of site CA-SDI-15114 (the archaeology site deemed a significant resource) within a legally dedicated open space easement. This would keep individuals from intentionally or inadvertently disturbing the site, thereby preserving the site. Implementation of the mitigation measure substantially lessens the significant effect because CA-SDI-15114 would be preserved. The preservation would ensure that relevant information contained in the archaeological record, which is important in understanding prehistory and history, is preserved. This mitigation measures will reduce the impact to a less than significant level, complies with existing regulations and will reduce project impacts to below a level of significance. Furthermore, all grading activities must comply with the provisions of the County of San Diego Grading Ordinance Section 87.429 as it relates to human remains and Native American artifacts which will ensure that, if encountered during grading, Native American artifacts and/or remains would be lawfully removed and disposed.

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